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11 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Indenture Trustee for*
12 *American Home Mortgage Investment Trust 2005-2*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 DEUTSCHE BANK NATIONAL TRUST
16 COMPANY, AS INDENTURE TRUSTEE
17 FOR AMERICAN HOME MORTGAGE
18 INVESTMENT TRUST 2005-2,

19 Plaintiff,

20 vs.

21 FIDELITY NATIONAL TITLE GROUP,
22 INC.; CHICAGO TITLE INSURANCE
23 COMPANY; CHICAGO TITLE OF
24 NEVADA, INC; DOE INDIVIDUALS I
25 through X; and ROE CORPORATIONS XI
26 through XX, inclusive,

27 Defendants.

Case No.: 2:21-cv-02265-APG-BNW

**STIPULATION AND ORDER FOR
LIMITED STAY OF DISCOVERY
PENDING MOTION FOR REMAND
[ECF No. 9]**

28 Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee for American Home Mortgage Investment Trust 2005-2 (“Deutsche Bank”) and Defendants Fidelity National Title Group, Inc., Chicago Title Insurance Company, and Chicago Title of Nevada, Inc., (collectively, “Defendants,” and with Deutsche Bank, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

WHEREAS, on December 30, 2021, Deutsche Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-846134-C [ECF No. 1-1];

WHEREAS, on December 30, 2021, Chicago Title Insurance Company filed a Petition

1 for Removal to this Court [ECF No. 1];

2 **WHEREAS**, on January 31, 2022, Deutsche Bank filed a Motion for Remand [ECF No.
3 9];

4 **WHEREAS**, the Motion for Remand has been fully briefed and is pending the Court's
5 decision [ECF Nos. 16, 28];

6 **WHEREAS**, on February 7, 2022, this Court entered its Scheduling Order [ECF No. 14].

7 **NOW THEREFORE**, the Parties, by and through their undersigned counsel, hereby
8 stipulate and agree as follows:

- 9 1. In the interests of judicial economy, the Parties stipulate and agree that discovery in
10 this case shall be **STAYED FOR 90 DAYS** pending the Court's decision on Deutsche
11 Bank's Motion for Remand [ECF No. 9];
- 12 2. The Scheduling Order [ECF No. 14] in this case is hereby **VACATED**.
- 13 3. The Parties shall not file any motions to enforce Party discovery while this stay is
14 pending.
- 15 4. Each of the Parties shall be excused from responding to any now-outstanding discovery
16 requests propounded by the other until after the stay is lifted.
- 17 5. Nothing contained in this stipulation will prevent the Parties from propounding and
18 enforcing third party subpoenas.
- 19 6. Nothing contained in this stipulation will affect any pending dispositive motions or
20 prevent the Parties from filing any dispositive motions.
- 21 7. Each of the Parties may request a further Fed R. Civ. P. 26(f) conference at any time
22 90 days after the order granting this Stipulation.
- 23 8. By entering into this Stipulation, none of the Parties is waiving its right to subsequently
24 move the Court for an order lifting the stay in this action.

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9. If the Court retains jurisdiction of this matter, the Parties will submit a new proposed discovery plan within thirty (30) days after the stay is lifted.

IT IS SO STIPULATED.

DATED this 8th day of March, 2022.

DATED this 8th day of March, 2022.

WRIGHT, FINLAY & ZAK, LLP

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

/s/ Lindsay D. Dragon

/s/ Sophia S. Lau

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Trustee for American Home Mortgage
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*Attorney for Defendants, Fidelity National
Title Group, Inc., Chicago Title Insurance
Company, and Chicago Title of Nevada, Inc.*

IT IS SO ORDERED.

Dated this 9th day of March, 2022.


UNITED STATES MAGISTRATE JUDGE